

EXHIBIT

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Kiely, Christian

From: Haley Proctor <hproctor@cooperkirk.com>
Sent: Tuesday, November 16, 2021 1:40 PM
To: Cooper, Howard
Cc: Kiely, Christian; Imran H. Ansari, Esq.; Oren, Kristy; Arthur L. Aidala, Esq.; Chuck Cooper; Michael W. Kirk; Nicole Moss
Subject: RE: Giuffre v. Dershowitz - Discovery Correspondence

Dear Howard,

I can confirm that Ms. Giuffre has no reports, results, or other read outs from lie detector or polygraph tests of Ms. Giuffre. I can also confirm that, to the extent that Ms. Giuffre has responsive documents that refer to such tests, we have either produced or logged them.

Ms. Giuffre does not have custody or control of all of Boise Schiller's documents, but we have made an inquiry and have been advised that they have no other electronic or hard copy reports, results, or other "read outs" from lie detector/polygraph tests of Ms. Giuffre.

Please advise on your availability for a meet and confer.

Thank you,
Haley

From: Cooper, Howard <hcooper@toddweld.com>
Sent: Monday, November 15, 2021 4:18 PM
To: Haley Proctor <hproctor@cooperkirk.com>
Cc: Kiely, Christian <ckiely@toddweld.com>; Imran H. Ansari, Esq. <iansari@aidalalaw.com>; Oren, Kristy <koren@toddweld.com>; Arthur L. Aidala, Esq. <aidalaesq@aidalalaw.com>; Chuck Cooper <ccooper@cooperkirk.com>; Michael W. Kirk <mkirk@cooperkirk.com>; Nicole Moss <nmooss@cooperkirk.com>
Subject: Re: Giuffre v. Dershowitz - Discovery Correspondence

Haley-

Please confirm that you are representing to us that neither your client nor her lawyers at Boies Schiller have any other electronic or hard copy materials related to any lie detector test of the plaintiff.

Thank you.

Howard M. Cooper

Todd & Weld LLP
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Boston, MA 02110
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On Nov 15, 2021, at 4:00 PM, Haley Proctor <hproctor@cooperkirk.com> wrote:

Dear Christian:

Plaintiff has no documents responsive to this request. The only responsive document of which we are aware—namely, the Rivera affidavit attached to Ms. McCawley’s response to one of Defendant’s bar complaints—should be in Defendant’s custody or control. We do not acknowledge that it is in Plaintiff’s custody or control, but we obtained it from Boies Schiller, and as a courtesy are producing it here.

Thank you,
Haley

From: Kiely, Christian <ckiely@toddweld.com>
Sent: Monday, November 15, 2021 9:59 AM
To: Haley Proctor <hproctor@cooperkirk.com>
Cc: Cooper, Howard <hcooper@toddweld.com>; Imran H. Ansari, Esq. <iansari@aidalalaw.com>; Oren, Kristy <koren@toddweld.com>; Arthur L. Aidala, Esq. <aidalaesq@aidalalaw.com>; Chuck Cooper <ccooper@cooperkirk.com>; Michael W. Kirk <mkirk@cooperkirk.com>; Nicole Moss <nmoss@cooperkirk.com>
Subject: RE: Giuffre v. Dershowitz - Discovery Correspondence

Haley,

We are in receipt of your letter and will review the purported issues you have raised and respond in writing later this week. We can then schedule a time to meet and confer on any remaining issues, including the deficiencies in Plaintiff’s production as identified in my November 3 email. However, as I stated in my November 4 email, our agreement to conduct a global meet and confer (including on the issues with Plaintiff’s productions which we raised more than a week prior to your November 12 letter) is contingent upon Plaintiff producing any lie detector reports, including those reference in the Boies Affidavit, without further delay. Please either produce those reports today or explain your basis for not doing so. If the reports are not produced today, we intend to raise this discrete issue with Judge Preska at tomorrow’s status conference.

Regards,
Christian

From: Haley Proctor <hproctor@cooperkirk.com>
Sent: Friday, November 12, 2021 10:03 PM
To: Kiely, Christian <ckiely@toddweld.com>
Cc: Cooper, Howard <hcooper@toddweld.com>; Imran H. Ansari, Esq. <iansari@aidalalaw.com>; Oren, Kristy <koren@toddweld.com>; Arthur L. Aidala, Esq. <aidalaesq@aidalalaw.com>; Chuck Cooper <ccooper@cooperkirk.com>; Michael W. Kirk <mkirk@cooperkirk.com>; Nicole Moss <nmoss@cooperkirk.com>
Subject: Giuffre v. Dershowitz - Discovery Correspondence

Dear Counsel:

Please see the attached correspondence.

Thank you,
Haley

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